

Jo Robertson  
BEFS  
25 Princes Street (3 fl)  
Edinburgh, EH2 4AD

[jrobertson@bef.s.org.uk](mailto:jrobertson@bef.s.org.uk)

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Dear Jo,

**The Historic Environment Strategy for Scotland: Our Place in Time – Consultation on Measuring Success**

Thank you for the opportunity to comment on this consultation.

**The Chartered Institute for Archaeologists**

The Chartered Institute for Archaeologists (ClfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves. The Institute was granted a Royal Charter of Incorporation on 03 June 2014.

ClfA has over 3,150 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

ClfA's Scottish Group has over 200 members practising in the public, private and voluntary sector in Scotland.

**Measuring Success**

**General**

ClfA welcomes the development of a Performance Measurement Framework for the Strategy for the Historic Environment in Scotland. *Our Place in Time* has a crucial role to play in the management and protection of the historic environment in Scotland and is strongly supported by ClfA.

Both as an engaged member of BEFS and in its own right, ClfA hopes fully to be involved in this and other aspects of the task of realising the vision clearly set out in *Our Place in Time* and we

regard this response as the beginning rather than the end of ClfA's contribution to the formulation of a Performance Measurement Framework.

ClfA endorses the general approach to the formulation of the Framework, with the SHEA playing an important part in the identification of Proposed Baseline 1 and, in a modified, form, helping to measure progress.

We appreciate the benefits of a Strategy which is owned by the sector. Nonetheless where such a strategy '*will be owned by everyone*' (final report of the Measuring Success Working Group (MSWG), page 22) there is always a risk that, in practice, it is owned by no-one and effectively sidelined. Strong leadership will still be required to ensure that the whole (or at least the majority) of the sector adopts the framework as a working document.

### **Specific Questions**

#### **Question 1: Do you think the short term measures (middle column) for section A could be improved upon and if so how?**

1.1 There will inevitably be a degree of cross-over between the strategic priorities in each of the 4 sections. Thus, for instance, priority A1 (*Decision-making is better informed*) is closely linked with the priorities in section B (*Understand: Investigate and Record*). Consequently, the comments under question 4 are also relevant to the short term measures under A1.

1.2 ClfA agrees with the commissioning of a comprehensive skills audit for the historic environment sector in Scotland, but this should build on work carried out by or in association with bodies such as ClfA (for instance, the *CPD & Training Scoping Study for the Marine Historic Environment in Scotland*<sup>1</sup> produced by Wessex Archaeology in 2013).

#### **Question 2: Do you have any other suggested short term measures for section A that could be implemented from April 2015?**

2.1 See under question 5 for short term measures relating to HERs / SMRs and the professional staff needed to maintain and support them.

2.2 Under Priority A3 (*Skills and capacity are developed*) it would be helpful to provide details of vocational training, CPD schemes, apprenticeships and bursaries available. ClfA and other professional bodies could contribute to this exercise.

#### **Question 3: Please provide any comments on the ideas for long term measures in section A (far right column)**

3.1. The brief descriptions of long-term measures in the consultation document are helpfully amplified in the final report of the MSWG. In particular, medium-term measures identified under A2 (for instance, a sector-produced joint statement explaining how its activities are contributing to the wellbeing agenda) would encourage and help to assess effectiveness and 'buy-in'.

3.2 Although the demands of time may preclude detailed analysis of mainstreaming before April 2015, the *'Audit of government policy areas links to the historic environment'* in the long term measures needs more in-depth consideration of the integration of the historic environment into areas such as the implementation of Common Agricultural Policy.

**Question 4: Do you think the short term measures (middle column) for section B could be improved upon and if so how?**

4.1 Yes, particularly with regard to HERs / SMRs which play a key role in the management and protection of the historic environment and are under severe financial pressure given the chronic constraint on public spending. In this regard it is not just the number of items recorded which is significant. HERs / SMRs need to conform to agreed professional standards and be maintained and supported by the expertise of professional staff. Information is required to identify

- areas where there is no or inadequate HER / SMR coverage measured in accordance with agreed standards
- areas where HERs / SMRs are not adequately (or at all) supported by appropriate expert staff.

4.2 It may not be possible to agree professional standards by April 2015, but ALGAO (Scotland) and others (for instance, The Archaeology Forum (TAF)) may be able to provide further information on HER / SMR coverage within that timescale.

4.3 ClfA agrees with the final report of the MSWG (page 14) that the Scottish Historic Environment Data Initiative (SHED) will have an important role to play in developing the measures for section B.

**Question 5: Do you have any other suggested short measures for section B that could be implemented from April 2015?**

5.1 No, save as mentioned above.

**Question 6: Please provide any comments on the ideas for long term measures for section B (far right column)**

6.1 The measures relating to HERs / SMRs need to be expanded as discussed above.

**Question 7: Do you think the short term measures (middle column) for section C could be improved upon and if so how?**

7.1 Meaningfully to address the issue whether historic environment protection is proportionate (priority C2), there needs to be better understanding of the nature and extent of undesignated assets. For short-term purposes the number of Canmore records may be the best proxy that can be found but further work is required in the medium and long term.

**Question 8: Do you have any other suggested short term measures for section C that could be implemented from April 2015?**

8.1 The effect of the exercise of permitted development rights upon the historic environment is a significant concern to ClfA and others in the sector (and is noted in C2.2 at page 35 of the MSWG final report). It may not be possible to gather significant data prior to April 2015, but it would be possible to identify the commissioning of a report on permitted development rights and the historic environment as a short-term measure – something which ClfA would strongly support and to which it would contribute.

8.2 Local authorities through their heritage and archaeological services play an integral part in supporting and enabling people to engage with the historic environment (priority C3). Information from ALGAO (Scotland) and others within the sector as regards the nature and extent of local authority services helping people to engage with the historic environment would be useful and provide some baseline information to assess the ongoing threat to such services. There is also a link with priority D1 (*Participation opportunities are increasing*).

**Question 9: Please provide any comments on the ideas for long term measures for section C (far right column)**

9.1 Those matters addressed under questions 7 and 8 which cannot be completed in the short term should be carried over to become medium- and long-term issues.

9.2 In addition, some more objective measures should be included in the long-term measures relating to priority C2 to complement levels of stakeholder confidence. These measures could include the number of recommendations by local authority heritage / archaeological services for the imposition of conditions or obligations relating to the historic environment; the number of planning permissions that actually contain such conditions or are supported by such obligations; the level of compliance with such conditions / obligations and the nature and extent of enforcement action in the event of non-compliance.

**Question 10: Do you think the short term measures (middle column) for section D could be improved upon and if so how?**

10.1 No comment.

**Question 11: Do you have any other suggested short term measures for section D that could be implemented from April 2015?**

11.1 No.

**Question 12: Please provide any comments on the ideas for long term measures for section D (far right column)**

12.1 ClfA and others in the sector produced the Southport Report on '*Realising the benefits of planning-led investigation in the historic environment: a framework for delivery*'<sup>2</sup> (2011). Although this related to the historic environment in England, a similar exercise could be undertaken in Scotland which would encompass many actions relating to priority D (*Value: Share and Celebrate*). The production of an equivalent Scottish report would hopefully provide further medium and long-term measures.

12.2 The long-term measure relating to priority D2 (*learning opportunities are increasing*) should not be confined to schools, but (as in the MSWG final report) should embrace lifelong learning.

**Question 13: Can you identify with this ‘flow’ and would this make a suitable structure for the wider framework?**

13.1 Yes, provided there is sufficient flexibility in the Framework to deal with the inevitable overlaps that will occur.

**Question 14: Do you agree that the framework should include a mix of qualitative as well as quantitative measures? Please give comments.**

14.1 Yes. It is necessary to maintain a mix between qualitative and quantitative measures; otherwise there can be a tendency for the evidence upon which qualitative measures are based to become largely anecdotal.

**Question 15: Do you agree that the framework should identify measures but not set targets? Please give comments.**

15.1 No. We appreciate that a ‘target culture’ can be counter-productive but believe that aspirational targets can help to focus efforts and facilitate progress.

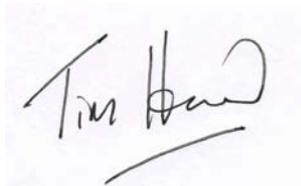
**Questions 16 – 19: Please see attached Respondent Information Sheet.**

**Question 20: We would be grateful to receive any further comments or questions on developing a Performance Measurement Framework for the Strategy *Our Place in Time*.**

20.1 ClfA would be pleased further to contribute to the development of a Performance Measurement Framework in any way that is of assistance.

In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,



Tim Howard LLB, Dip Prof Arch  
Senior Policy Advisor

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<sup>1</sup> [http://www.archaeologists.net/sites/default/files/node-files/WA\\_ProfessionalTrainingNeeds.pdf](http://www.archaeologists.net/sites/default/files/node-files/WA_ProfessionalTrainingNeeds.pdf)

<sup>2</sup> <http://www.archaeologists.net/sites/default/files/node-files/SouthportreportA4.pdf>